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November 25, 2020

Via ECF

The Honorable Paul A. Crotty
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007-1312

11/30/2020

The December 2nd conference is
adjourned to Wednesday,
December 16, 2020 at 12 noon.
SO ORDERED.



Re: Cheryl Krist v. Beth Israel Medical Center and Mount Sinai Hospital, 17-cv-01312 (PAC)

Dear Judge Crotty:

I am co-counsel to the plaintiff in the above-entitled action. We write to respectfully request that the status conference scheduled for December 2, 2020 at noon be re-scheduled. Defendants' counsel agrees to this request.

The parties have conferred amongst themselves and are available December 15, 16 and 23, 2020. Consequently, plaintiff asks that the Court adjourn the status conference to any of the above-mentioned available dates, or another date convenient for the Court.

Due to the difficulties in scheduling and holding depositions in the time-period leading up to, and during the current pandemic, the parties made multiple requests to postpone this status conference. The parties sought the last adjournment, which the Court also graciously granted, to enable the parties to receive outstanding deposition transcripts prior to the next status conference so the parties can address outstanding issues, if any, with the Court.

The parties received the final transcript and in light of information gleaned from the depositions and new events, plaintiff intends to file a pre-motion letter with the Court in advance of the next Court conference. However, given the scheduled date of the next Court conference, plaintiff would need to file its pre-motion letter today, which would result in defendants having to work over the extended Thanksgiving holiday should they choose to respond. Plaintiff wishes to avoid such consequence and consequentially makes this request.

Thank you for your time and attention to this matter.

Very truly yours,

/s/ Susan K. Smith

Susan K. Smith, Esq.